

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In re

*Public Safety and Homeland Security Bureau Seeks
Comment on Response Efforts Undertaken During
2017 Hurricane Season*

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) PS Docket No. 17-344
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COMMENTS OF CHARTER COMMUNICATIONS, INC.

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Charter Communications, Inc. files these comments in response to the Commission's request for comment on response efforts undertaken during the 2017 hurricane season.¹ As a significant provider in some of the areas hardest hit by Hurricanes Irma and Harvey, Charter found itself at the front lines of efforts to respond to these major natural disasters. As described below, thorough preparation, effective communication with private and public sector partners, and an unwavering focus on customer impact all contributed to Charter's success in restoring service as quickly as possible and providing assistance to the affected communities before, during, and after the storms.

Charter provides a host of communications services throughout the Florida and Texas regions, including cable television, Internet, phone, home security, and public Wi-Fi. All seventeen Florida counties covered by Charter were affected by Hurricane Irma, including but not limited to Hillsborough, Pinellas, Orange, and Brevard. Because of the path of the storm, Hurricane Harvey had a much smaller impact on Charter customers, primarily affecting those in southeastern Texas (including Hardin, Harris, Jefferson, and Orange counties), as well as in Corpus Christi and its surrounding communities.

I. PREPARATION FOR THE STORMS WAS ESSENTIAL TO MINIMIZING THEIR IMPACT ON CHARTER CUSTOMERS.

As a leading and longstanding communications provider, Charter was aware of the preparation needed to minimize the impact of devastating storms on its customers. Planning and preparation enabled Charter to more effectively and expeditiously restore service after the storms.

First, as a matter of company policy, Charter routinely performs a hurricane simulation to provide its employees with training for natural disasters such as Irma and Harvey. Charter had

¹ See *Public Safety and Homeland Security Bureau Seeks Comment on Response Efforts Undertaken During 2017 Hurricane Season*, PS Docket No. 17-344, DA 17-1180 (2017).

performed its most recent simulation on June 26, 2017, which served its operations teams well when the hurricanes struck only a few months later.

Second, in anticipation of the storms in both Florida and Texas, Charter activated detailed Disaster Emergency Action Plans. This involved manning war rooms and local command centers; performing comprehensive pre-storm checks at all telecommunications sites to ensure maximum fuel for all emergency standby generators; testing and activating alternate communications systems; securing all office facilities, hubs, head ends, and data centers; and confirming all employees, and particularly technicians, had contact information to receive updates and work assignments.

Third, Charter strategically pre-positioned its employees, equipment, and supplies to minimize its recovery time. In Florida, this involved staging portable spare hub generators at eleven home locations for use in the immediate aftermath of the storm. Given the uncertainty of the hurricane's direction, determining safe locations at which to stage these backup hub generators was a challenge. Nonetheless, strategically placing these generators proved to be very important, as it lowered the average amount of time Charter needed to repair hub sites that lost commercial power. Another pre-positioning activity that proved particularly valuable was Charter's decision to assign select employees to man its regional operation center. This staffing decision ensured constant communication during the storm and allowed Charter to deploy materials and resources during the critical hours immediately after.

In Texas, the slow movement and geographical sprawl of Harvey made effective pre-staging more difficult than it proved to be for Irma in Florida. Nevertheless, before landfall, Charter was able to move vehicles to high ground, top off fuel tanks at hub sites, test power supply generators, ensure trucks were fully stocked, and ensure incoming technical support were provided

with safety equipment. Charter also was able to secure contract labor to aid in recovery efforts, use tankers to secure on-site fuel for field employee disbursement, and distribute the FEMA essential services authorization to personnel who would be entering impacted areas.

II. COORDINATION AND COMMUNICATION WERE CRUCIAL IN CHARTER'S RECOVERY EFFORTS.

In Florida, Charter customers suffered over 14,000 outages due to Hurricane Irma. And in Texas, Hurricane Harvey resulted in a total of 669 reported outages at the node level, impacting tens of thousands of accounts. However, due to preparation, coordination, and communication, Charter was able to restore service to most affected customers in a relatively short period of time. For example, in Florida where Charter was most significantly impacted, within 10 days after Hurricane Irma hit the region, service had been restored to 90% of customers originally impacted by the storm. For the remaining ten percent of customers, the vast majority of outages was caused by loss of power to homes or businesses or to Charter's network. Charter deployed more than 3,000 technicians to make repairs for non-power related outages as soon as areas were safe. Similarly in Texas, crews worked around the clock to mitigate Harvey's impact on our customers with restoration efforts quickly following the progression of power restoration.

Charter ensured that its staff and contractors were effectively mobilized to address the crisis. In response to Hurricane Irma, over 2,000 Charter employees and an additional 2,300 Charter contractors were involved in the recovery effort. In Texas, a total of 608 Charter personnel were involved in the recovery effort, ranging from field operations management to construction technicians.

Coordination with federal, state, and local partners was important to Charter's response efforts. Charter has a collaborative relationship with the Department of Homeland Security ("DHS") and actively participates in the National Coordination Center for

Communications/Communication Information Sharing Analysis Center (“NCC/Comm-ISAC”), including participation in a DHS/FEMA After Action Report meeting on January 17, 2018. This ongoing relationship allowed Charter greater communication and coordination with federal agencies, including FEMA, before, during, and after the storms. For example, Charter was able to obtain DHS access letters and debris removal guidance letters, to be used with local officials, which aided in our recovery efforts. Charter also coordinated with state and county Emergency Operation Centers (“EOCs”), which proved to be important partners in minimizing recovery time. Several EOCs, particularly in Texas, were in damaged areas and required restoration of service to get back online. Where possible, Charter prioritized expediting the recovery of service to these centers.

Charter successfully coordinated with cell tower providers and carriers as it managed recovery efforts. Charter also remained in constant communication with its vendors both before and throughout the storm—to ensure that they had appropriate materials and resources at the ready to address the emergency.

Charter also takes very seriously its obligations under the Emergency Alerting System (“EAS”). For Hurricanes Harvey and Irma, Charter received several EAS alerts from FEMA through the Integrated Public Alert and Warning System (“IPAWS”) or from local civil authorities. Charter forwarded all FCC-required alerts to customers with analog or digital TV service in our footprint.

One lesson learned from Charter’s Irma and Harvey recovery efforts is that even closer coordination with public and private partners may be beneficial. On the public side, in Florida in particular, curfews, road closures, and incomplete access to evacuation zones impacted Charter’s ability to conduct early ride out assessments after the storm. On the private side, widespread

commercial power outages and variable information sharing by power companies prevented Charter from being even quicker in its response. In many cases, Charter needed to initiate communication with the power companies to coordinate restoration. Particularly in the first weeks of recovery, partnership with the power companies could have benefitted from greater organization and more mutual outreach.

III. CHARTER REMAINED DEDICATED TO CUSTOMER SERVICE DURING AND AFTER THE STORMS.

Throughout the storms, Charter stayed true to its customer-first ethos and commitment to provide superior customer service. Beginning in 2016, Charter standardized its processes for customer service response in the event of natural disasters. These policies allowed Charter to ensure effective and efficient assistance to customers during and after the storm.

In response to Hurricane Irma, Charter fielded inbound calls from customers who reported impacts to their service and offered these customers a number of options to address service interruptions. As a baseline, customers were not charged for damaged equipment (which Charter has replaced free of charge) and were not charged any installation fee when transferring to a temporary location. In addition, Charter has extended over \$3.6 million in bill credits to address service interruptions caused by Irma. Finally, Charter has proactively identified and reached out to 170 customers whose homes became unlivable because of Irma. Charter's service representatives were able to assist customers in navigating their options, including retaining, transferring, or disconnecting service as requested, or enrolling in a special natural disaster service retention offer where appropriate.

In Texas, Charter took the same proactive approach to making its customers whole in its response to Hurricane Harvey. Charter issued credits to over 68,000 customers in mandatory evacuation zones, as well as to customers attached to nodes affected by outages. In addition,

Charter offered credits to the over 22,000 additional customers who called in to discuss service interruptions related to the storm. In total, Charter issued over \$3.7 million in credits to customers affected by Harvey. Finally, as with Irma, Charter conducted field operation walk-outs to identify unlivable homes—and, tragically, identified over 2,700 such properties. Charter affirmatively reached out to nearly all of these customers to discuss service options, including transfer and disconnection.

IV. CHARTER WAS STEADFAST IN ITS COMMITMENT TO THE COMMUNITIES IT SERVES BEFORE, DURING AND AFTER THE HURRICANES.

Charter is more than a critical communications service provider in the regions it serves. With approximately 7,600 employees in Florida and more than 10,000 employees in Texas, Charter is very much a part of the neighborhoods and communities affected by these hurricanes. Accordingly, Charter recognized that these historic storms would have life-altering effects, and aspired to use a broad range of resources to help these communities cope with the devastating weather.

For instance, customers were able to rely upon Charter's Spectrum News Networks to provide critical news and likely lifesaving information before, during, and after the storms. Spectrum Bay News 9 in Tampa Bay and Spectrum News 13 in Orlando together employ ten full-time weathercasters, all of whom are certified broadcast meteorologists recognized by the American Meteorological Society, and several of whom are certified to teach severe weather preparedness to state and local government agencies. These channels began tracking Irma when it formed in the Atlantic, proceeded to offer hurricane updates six times an hour starting a week before landfall, and continuously covered the storm when it hit. The public relied on the information provided by these channels' expert weathercasters. Over the eight day hurricane coverage period, more Spectrum customers tuned in to Spectrum Bay News 9 and Spectrum News

13 than The Weather Channel or any of the broadcast and cable news networks in the Tampa and Orlando regions.

Although Charter's Texas communities were not as affected by Hurricane Harvey, Charter similarly used its local networks, Spectrum News Austin and San Antonio, to provide the public with consistent, continuous, and accurate coverage. Employing seven full-time meteorologists, Spectrum News began tracking the storm as it moved toward the Texas coast, and provided non-stop weather coverage when the storm made landfall. In both Florida and Texas, Charter offered live streaming of that coverage (free to the public, without a Spectrum login), and in affected areas opened its public-facing WiFi to non-customers, to facilitate access to critical news about the storm.

Charter's efforts to support the local communities hit hardest by Harvey and Irma did not end with the departure of the storms. Recognizing the efforts that would be needed in these local communities, Charter contributed \$700,000 to our Spectrum Housing Assist partner, Rebuilding Together, to be used for the repair, renovations, and rebuilding of homes desperately needed in areas hit by the storms. Charter also provided \$3.2 million in public service advertising air time across our footprint, to assist organizations with fundraising and awareness efforts to help residents of the affected areas.

CONCLUSION

Charter agrees with Chairman Pai that "[a]ccess to reliable communications services during times of emergency is critical to enabling Americans in danger to request help and our heroic first responders to do their jobs."² Preparation, communication, and a dedication to its customers

² Chairman Ajit Pai, *September 2017 Open FCC Meeting, Presentation on FCC Response to Hurricanes Harvey, Irma and Maria*, Statement (Sept. 26, 2017), <https://www.fcc.gov/document/presentation-fcc-responsehurricanes-harvey-irma-and-maria/pai-statement-0>.

helped Charter effectively respond to the devastating hurricanes. Charter will continue to increase communication and coordination with its private and public partners to ensure recovery is as effective as possible. And through directly working with customers regarding their service, providing highly regarded local news and information with our Spectrum News Channels and our signature program Spectrum Housing Assist, Charter continues to stand and support the customers and communities affected by those storms.

Respectfully submitted,

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